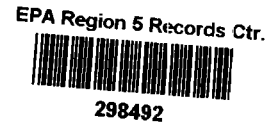


**United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604**



April 20, 2000

Mr. Gerald E. Willman  
Illinois Environmental Protection Agency  
National Priorities List Unit  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Re: Southeast Rockford Groundwater Contamination - OU #3  
Final Risk Assessment Report

Dear Mr. Willman:

Thank you for sending along the two copies of the Final Risk Assessment report for the source control operable unit portion of site activity at Southeast Rockford. In looking back at the comments that the U.S. EPA had concerning the draft document from last summer, I see that the main comments concerned:

- further distinguishing between background and site related chemicals
- how the TACO process focuses on chemicals that pose risk
- examining a possible agricultural scenario for Area 7
- examining "hot spot" issues

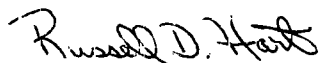
While I would like to note some of the specific changes in the final report in a bit more detail, I believe that basically the final report has added explanation and provided clarification such that U.S. EPA's previous comments have been satisfactorily addressed. In particular I note that:

- The listing of Figures has been greatly expanded, with newly added material concentrating on the assessment process, background soil sample locations, and "hot spot" delineation. I think this is a big help in overall report understanding.
- The additional language at the end of paragraph 1 on page 1-1 gives the reader a better understanding of how the Tier process can be used to establish remediation objectives.
- Figures 1 and 2 give a good presentation of the "logic flow" in the Tier 1 and 3 assessment process.

- Page 2-1 indicates that a third exposure pathway - ingestion of vegetables - has been added for examination. This addresses one of the comments noted above.
- The final sentence added on page 2-2 illustrates that when the soil remediation objectives are attained that risk will have been brought within acceptable range.
- Text added on page 3-12 and the figures that follow add useful information concerning where/how background soil conditions were derived.
- While the four exclusion criteria on page 3-17 are the same, the text has been reworded and gives a clearer understanding of exclusion criteria application.
- The footnotes added to Table 16 provide clearer term definition.
- Section 4.2 adds the vegetable ingestion pathway. Although it turns out this pathway does not pose an unacceptable risk, it was useful to explore this given the crop usage of a portion of Area 7.
- There are two points, on pages 3-25 and 4-10, where reference is made to "one in a hundred thousand" where possibly one in ten thousand is intended. On page 3-25, U.S. EPA's upper limit acceptable carcinogenic risk range is  $10^{-4}$ , or one in ten thousand. On page 4-10, the text notes "...must be less than one in *one hundred* thousand ( $1.0E-04$ )..." Shouldn't that be "in ten thousand"?
- Finally, on page 5-1, the added text better explains how the feasibility study is crafted to try to attain the values established by the Tier 1/3 approach.

Thanks for letting us review.

Yours truly,



Russell D. Hart, RPM  
RRB #2 - Section #5